

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Dante Brown,

Plaintiff,

vs.

Wexford Health Sources, et al.,

Defendant.

CASE NO. 18-CV-05955

JUDGE SHARON JOHNSON
COLEMAN

PLAINTIFF DANTE BROWN'S UNOPPOSED MOTION FOR LEAVE TO FILE AN
OMNIBUS AND OVERSIZED MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Plaintiff Dante Brown ("Plaintiff"), by and through his attorneys, Benesch, Friedlander, Coplan & Aronoff, hereby respectfully requests this Court grant his leave to file an Omnibus and Oversized Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment in excess of the fifteen (15) page limit imposed by Local Rule 7.1 and in support thereof, states as follows:

1. Mr. Brown has sued Wexford Health Sources and several named doctors, including Dr. Orenstein, Dr. Obaisi, and Dr. Mitchell, under 42 U.S.C. § 1983, and has brought claims for medical malpractice and negligence in violation of state law. *Id.*
2. On October 7, 2022, Defendant Jacqueline Mitchell filed a twenty-two-page (22) Motion in Support of Summary Judgment on her singular behalf. Dkt. 214. On October 7, 2022, the Wexford Defendants filed a nineteen-page (19) Motion in Support of Summary Judgment on behalf of the Wexford Defendants. Dkt. 211.
3. Defendant Mitchell contemporaneously filed a Motion for Leave to File an Oversized Memorandum of Law when she filed her Motion for Summary Judgment. Dkt. 207. In that motion, she indicated that "Plaintiff's counsel does not oppose the motion [for excess

pages], on the condition that Plaintiff is allowed to file a response in excess of fifteen pages.” The Motion was granted on October 28, 2022. Dkt. 215.

4. In responding to both Motions for Summary Judgment, Plaintiff has determined it would be most efficient to respond to both Defendant Mitchell and the Wexford Defendants’ Motions for Summary Judgment in a single brief.
5. Plaintiff needs less than 35 pages for a single, omnibus brief in Opposition to Defendants’ Motions for Summary Judgment.
6. Plaintiff’s counsel has consulted with both Defendants’ counsel about this motion and Defendants’ counsel does not oppose the motion.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests this Honorable Court enter an order granting his Motion for Leave to File an Omnibus and Oversized Memorandum of Law in Opposition to Defendants’ Motions for Summary Judgment in excess of fifteen (15) pages.

Dated: November 21, 2022

Respectfully submitted,

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